## **DEVARSHI COMMERCIALS LLP**

(REGISTERED WITH LIMITED LIABILITY) LLP IDENTIFICATION NO - AAA-1151

Regd. Office: 84-A, Mittal Court, 8th Floor, 224, Nariman Point, Mumbai 400 021. Tel.: 22022364/65, Fax: 22871046.

March 17, 2017

National Stock Exchange of India Limited Exchange Plaza Plot No. C/1, G Block Bandra-Kurla Complex Bandra (East) Mumbai 400 051. BSE Ltd Phiroze Jeejeebhoy Towers Dalal Street Mumbai 400 001.

Dear Sirs,

Sub: Disclosure under Regulation 29(1) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 {"Takeover Regulations"}

Please find attached the disclosure under Regulation 29(1) in respect of acquisition of shares made on March 15, 2017.

Kindly take the same on record.

Thanking you,

Yours faithfully, For Devarshi Commercials LLP (For and on behalf of all Acquirers)

Priyen-Shah Authorised Signatory

Encl: as above

Format for Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part-A- Details of the Acquisition

Name of the Target Company (TC)	Reliance Industries Limited					
Name(s) of the acquirer and Persons Acting	i) Tattvam Enterprises LLP					
in-Concert (PAC) with the acquirer	ii) Karuna Commercials LLP					
Whether the acquirer belongs to	Yes.					
Promoter/Promoter group						
Name(s) of the Stock Exchange(s) where	BSE Ltd.					
the shares of TC are Listed	National Stock Exchange of India Ltd.					
Details of the acquisition as follows	Number		.t. total	% w.r.t. total diluted		
		share capital of TC(*)	voting capital of TC(*)	share capital of TC(**)	voting capital of TC(**)	
Before the acquisition under consideration, holding of acquirer <del>along</del> with PACs of:			,			
a) Shares carrying voting rights i) Tattvam Enterprises LLP ii) Karuna Commercials LLP b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/	4 06 85 883 100	1.25 0.00	1.32 0.00	1.25 0.00	1.32	
others) c) Voting rights (VR) otherwise than by	NA	NA	NA	NA	, NA	
equity shares  d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in	NA	NA	NA	NA	NA	
the TC (specify holding in each category) e) Total (a+b+c+d)	NA	NA	NA	NA	N/	
i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	4 06 85 883 100	1.25 0.00	1.32 0.00	1.25 0.00	1.32 0.00	
Details of acquisition						
a) Shares carrying voting rights acquired i) Tattvam Enterprises LLP ii) Karuna Commercials LLP b) VRs acquired otherwise than by equity shares c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying category) acquired d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/	13 46 16 711 25 40 83 398	4.15 7.84	4.38 8.27	4.15 7.84	4.3 8.2	
	NA	NA	NA	NA	N/	
	NA	NA	NA	NA	N/	
others) e) Total (a+b+c+/-d)	NA	NA	NA	NA	N/	
i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	13 46 16 711 25 40 83 398	4.15 7.84	4.38 8.27	4.15 7.84	4.3 8.2	
		5				



Details of the acquisition as follows	Number	% w.r	t, total	% w.r.t. total diluted		
		share capital of TC(*)	voting capital of TC(*)	share capital of TC(**)	voting capital of TC(**)	
After the acquisition, holding of acquirer along with PACs of:						
a) Shares carrying voting rights         i) Tattvam Enterprises LLP         ii) Karuna Commercials LLP     b) VRs otherwise than by equity shares     c) Warrants/convertible securities/any other	17 53 02 594 25 40 83 498 NA	5.40 7.84 NA	5.70 8.27 NA	5.40 7.84 NA	5.70 8.27 NA	
instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition d) Shares in the nature of encumbrance	NA	NA	NA	NA	NA	
(pledge/ lien/ non-disposal undertaking/ others)	NA	NA	NA	NA	NA	
e) Total (a+b+c+d) i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	17 53 02 594 25 40 83 498	5.40 7.84	5.70 8.27	5.40 7.84	5.70 8.27	
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)						
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	Securities acquired are existing fully paid Equity Shares.					
Date of acquisition of/ date of receipt of intimation of allotment of shares / VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC.						
Equity share capital / total voting capital of the TC before the said acquisition	Equity Share Capital - 324,39,82,206 (No. of shares) Voting Capital - 307,20,99,386 (No. of shares)					
Equity share capital/ total voting capital of the TC after the said acquisition	Equity Share Capital - 324,39,82,206 (No. of shares) Voting Capital - 307,20,99,386 (No. of shares)					
Total diluted share/voting capital of the TC after the said acquisition	Diluted Share Capital - 324,39,82,206 (No. of shares) Diluted Voting Capital - 307,20,99,386 (No. of shares)					

### NA - Not Applicable

The Acquirers and sellers are part of the promoter and promoter group. The aggregate shareholding of the promoter and promoter group prior to the transfers and after the transfers has remain unchanged.



For Devarshi Commercials LLP (For and on behalf of all Acquirers)

Priyen Shah

**Authorised Signatory** 

Place: Mumbai Date: 17.03.2017

#### Note:

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(\*\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.



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National Stock Exchange of India Limited Exchange Plaza Plot No. C/1, G Block Bandra-Kurla Complex Bandra (East) Mumbai 400 051. BSE Ltd Phiroze Jeejeebhoy Towers Dalal Street Mumbai 400 001.

Dear Sirs,

Sub: <u>Disclosure under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and</u>
Takeovers) Regulations, 2011 {"Takeover Regulations"}

Please find attached the disclosure under Regulation 29(2) in respect of acquisition of shares made on March 15, 2017.

Kindly take the same on record.

Thanking you,

Yours faithfully, For Devarshi Commercials LLP (For and on behalf of all Acquirers)

Priyen Shah Authorised Signatory

Encl: as above

# Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Torget Company (TC)	Polioneo Industrio	a Limitad				
Name of the Target Company (TC)	Reliance Industrie					
Name(s) of the acquirer/ seller and Persons Acting in Concert (PAC) with the acquirer	i) Tattvam Enterprises LLP ii) Karuna Commercials LLP					
Whether the acquirer / seller belongs to Promoter/Promoter group	Yes					
Name(s) of the Stock Exchange(s)	BSE Ltd.					
where the shares of TC are Listed	National Stock Exchange of India Ltd.					
Details of the acquisition / disposal	Number % w.r.t. total % w.r.t. total diluted					
as follows						
		share capital of TC(*)	voting capital of TC(*)	share capital of TC(**)	voting capital of TC(**)	
Before the acquisition / sale under consideration, holding of :						
a) Shares carrying voting rights i) Tattvam Enterprises LLP ii) Karuna Commercials LLP b) Shares in the nature of encumbrance (pledge/ lien/	4 06 85 883 100	1.25 0.00	1.32 0.00	1.25 0.00	1.32 0.00	
non-disposal undertaking/ others)	NA	NA	NA	NA	NA	
c) Voting rights (VR) otherwise than by shares	NA	NA	NA	NA	NA	
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding	IVO	ING.	No	10/1	101	
in each category) e) Total (a+b+c+d)	NA	NA	NA	NA	NA	
i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	4 06 85 883 100	1.25 0.00	1.32 0.00	1.25 0.00	1.32 0.00	
Details of acquisition/sale						
a) Shares carrying voting rights acquired/sold						
i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	13 46 16 711 25 40 83 398	4.15 7.84	4.38 8.27	4.15 7.84	4.38 8.27	
b) VRs acquired /sold_otherwise than by shares c) Warrants/convertible securities/any other instrument	NA	NA	NA	NA	NA	
that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding						
in each category) acquired/sold d) Shares encumbered /	NA	NA	NA	NA	NA	
invoked/released by the acquirer e) Total (a+b+c+/-d)	NA	NA	NA	NA	NA	
i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	13 46 16 711 25 40 83 398	4.15 7.84	4.38 8.27	4.15 7.84	4.38 8.27	

Details of the acquisition / disposal	Number % w.r.t. total			% w.r.t. total diluted		
as follows		share capital of TC(*)	voting capital of TC(*)	share capital of TC(*)	voting capital of TC(*)	
After the acquisition/sale, holding of:						
a) Shares carrying voting rights     i) Tattvam Enterprises LLP     ii) Karuna Commercials LLP	17 53 02 594 25 40 83 498	5.40 7.84	5.70 8.27	5.40 7.84	5.70 8.27	
b) Shares encumbered with the acquirer	NA	NA	NA	NA	NA	
c) VRs otherwise than by shares d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding	NA	NA	NA	NA	NA	
in each category) after acquisition	NA	NA	NA	NA	NA	
e) Total (a+b+c+d) i) Tattvam Enterprises LLP ii) Karuna Commercials LLP	17 53 02 594 25 40 83 498	5.40 7.84	5.70 8.27	5.40 7.84	5.70 8.27	
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer amongst promoter group entities by way of purchase and sale on the block deal window of BSE Ltd.					
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable.	15.03.2017					
Equity share capital / total voting capital of the TC before the said acquisition / sale	Equity Share Capital - 324,39,82,206 (No. of shares) Voting Capital - 307,20,99,386 (No. of shares)					
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Equity Share Capital - 324,39,82,206 (No. of shares) Voting Capital - 307,20,99,386 (No. of shares)					
Total diluted share/voting capital of the TC after the said acquisition	Diluted Equity Share Capital - 324,39,82,206 (No. of shares) Diluted Voting Capital - 307,20,99,386 (No. of shares)					

NA - Not Applicable

The Acquirers and sellers are part of the promoter and promoter group. The aggregate shareholding of the promoter and promoter group prior to the transfers and after the transfers has remain unchanged.

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

For Devarshi Commercials LLP (For and on behalf of all Acquirers)

Priyen Shah Authorised Signatory

Place: Mumbai Date: 17.03.2017

